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Iran and Sudan

Trade Sanctions Reform and Export Enhancement Act of 2000

This page provides information for use by persons who wish to use the expedited export license application procedure of the Treasury Department, [Office of Foreign Asset Controls](#), for exports of medicines or medical devices to Iran or Sudan. The U.S. Department of Treasury's Office of Foreign Assets Control (OFAC) and not the Department of Commerce issues licenses for the export and reexport of medical devices to Iran and Sudan pursuant to the Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA).

This page includes a list of basic medical devices that have been determined to be EAR99 and for which license applications to export to Iran or Sudan may be submitted to the Treasury Department, Office of Foreign Assets Control, without an accompanying commodity classification from the Department of Commerce, Bureau of Industry and Security. This page also includes guidance for EAR99 medicines and agricultural commodities.

From time-to-time, the contents of this page may change because the technical characteristics of items on it may change, items might be reclassified by BIS, or the Commerce Control List might be amended to include some of these items. Before filing a license application with OFAC, check the current page. "Medicines" and "medical devices" are defined in Part 772 of the Export Administration Regulations.

ILLUSTRATIVE LIST OF EAR99 MEDICAL DEVICES

Medical devices: For purposes of TSRA, medical devices are "devices" as defined in section 201 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 321) including medical supplies, instruments, equipment, equipped ambulances, institutional washing machines for sterilization, and vehicles with medical testing equipment. Medical devices that are listed on the CCL are not eligible for export or reexport to Iran or Sudan pursuant to TSRA.

Exporter Guidance: BIS and OFAC encourage self-classification of obviously EAR99 items. Please use the list below for the types of medical devices that are EAR99 and do not require a Commodity Classification (CCAT) from BIS. However, OFAC may request a CCAT if OFAC has concerns about a specific product. When submitting a CCAT, include the model name and number, and please reference any former CCATs by the G#. Please note that only six items can be listed on each CCAT.

Ablation device, radio frequency
Adhesive, surgical
Analyzers, hematology
Autoclave for medical instrument sterilization
Bag, catheter drainage/collection
Bags, I.V.
Balloon, extractor retrieval
Bandage, Elastic
Bandage/gauze Compresses
Bath, therapeutic
Bath cubes, therapy
Beds, hospital
Bed pans
Biohazard waste plastic bags
Blood lancets
Blood collecting tubes
Bone graft matrix
Boots, lined for heat relief
Bottles, prescription
Bottles, specimen
Burn dressings
Canes
Capnograph
Cardiac pacemaker
Cardiac defibrillator, internal
Carts, crash
Carts, medication
Carts, oxygen
Cast, boot
Catheter, angiography
Catheter, balloon
Catheter, cardiac
Catheter, diagnostic
Catheter, dilatation
Catheter, infusion
Catheter, intra-aortic balloon

Catheter, micro
Catheter, temperature ablation
Catheter, urinary
Catheter, valvuloplasty
Cervical collar, soft
Cervical fusion kit
Chair, dental
Clips, surgical
Coils, guidewire
Cotton swabs
Crutches
Devices, non-invasive resuscitation
Dilator, vascular
Electrodes for use with defibrillator
First-aid dressing
Flowmeters, oxygen & air pressure
Forceps
Gauze tube
Gloves, latex exam
Gloves, latex surgical
Grafts, peripheral bypass
Guidewires, micro
Guidewires, urological
Guidewires for nephrotomy procedures
Gurneys
Humidifiers
Implants (& screws & abutments), dental
Instrument tray, plastic
Irrigator, laparoscopic
Lactate ringers
Lift, patient chair
Light, phototherapy
Limb prosthesis
Liner, mitts and boot for therapeutic pain relief
Liquid disinfectant soap
Litters
Manikin, medical training

Medical/dental film, X-ray
Medical lights
Medicine cup holder
Meter, portable temperature
Monitor, anesthetic agent patient
Monitor, digital blood pressure
Monitor, vital signs
Nasal catheter oxygen apparatus
Naso-gastro tube
Nebulizer
Needles, cautery
Needles, surgical guidewire
Orthopedic plates/screws
Orthopedic fixators, external
Orthopedic fixators, internal
Orthopedic implants
Orthopedic stockinette
Ostomy tube, adhesive
Ostomy cleanser bottle
Ostomy bag
Oximeter, pulse
Padding, under cast
Pads, elbow & foot
Patient gowns
Patient underpads
Pens, cautery
Placement sets, I.V.
Pouches, urostomy
Povidone-iodine pads
Povidone-iodine solution
Refrigerator, compartmental for morgues
Removers, surgical
Scale, chair
Scalpels, disposable
Scrubs, surgical
Sphincterotomes, medical
Splints

Staples, surgical
Stent, extending endoprosthesis
Stent, ureteral
Sterilization roll tube
Sterilization tape
Surgical drapes
Surgical drapes, disposable
Surgical dressings
Surgical foot covers
Surgical gown
Surgical gown/mask caps
Surgical masks
Surgical procedure packs, disposable
Surgical scrub brushes
Surgical stand
Surgical sutures
Surgical tape
Surgical wrap
Suture removal kits
Syringes
Table, traction
Tents, pediatric, aerosol, & mist
Thermometers, mercury for measuring human body temperature
Tongue depressors
Tourniquet
Tracheostomy tubes
Tube, catheter
Ultrasound
Urine test strip
Urine collection bags
Urine collection bottle
Ventilator, infant/pediatric
Walkers
Wash basin, plastic
Whirlpool, hydrotherapy designed for burn treatment

Wound drainage tubes
Wrist band, patient I.D.

Medicines: For the purposes of TSRA, medicines means "drug" as defined in section 201 of the Federal Food, Drug and Cosmetic Act (21 U.S.C. 321). Medicines includes prescription and over the counter medicines for humans and animals. Note that certain medicines, such as vaccines and immunotoxins, are on the Commerce Control List. Only items meeting the definition of "medicine" and that are classified as EAR99 are eligible for export to Iran and Sudan under the licensing procedures set forth in the appropriate regulations promulgated and administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC).

Exporter guidance: Medicines, including over the counter items, require a CCAT. When submitting a CCAT, six commodities can be submitted on one application. Multiple drugs can be grouped together by description (not a chemical description). For example: Commodity 1 (anti-hypertensives) (atenolol, bloodpressure med x, etc.) Commodity 2 (antibiotics) (amoxicillin capsules and drops, tetracycline caps, etc.)

Agriculture Commodities: For the purposes of TSRA, agricultural commodities are defined in Section 102 of the Agricultural Trade Act of 1978 and listed at www.csrees.usda.gov.

Exporter guidance: OFAC does not require a CCAT for any agricultural items except for fertilizer, western red cedar, and live horses. OFAC considers vitamins and minerals, food additives, dietary supplements, and bottled drinking water in the definition of agricultural commodities (See 66 FR 36683).

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